

5170 RF 93

DUE
DATE 1-14-94

States Government

Department of Energy

memorandum

Dec 8 7 45 AM Rocky Flats Office

ACTION Hutchins

DIST. LTR ENC

DEC 07 1993

ERD:BKT:13648

Active Tanks Within Operable Unit 9 - Original Process Waste Lines (BDP-028-93)
and 750 and 904 Pads Within Operable Unit 10

Ned Hutchins, Acting Associate General Manager
Environmental Management
EG&G Rocky Flats, Inc.

This memorandum is in response to the above-referenced document from EG&G regarding active tanks in Operable Unit 9 (OU 9). This issue is much larger than the active tanks at OU 9 and includes Individual Hazardous Substance Sites (IHSSs) at OU 10 and OU 15. A meeting to discuss the issue of active units under the RFP Interagency Agreement (IAG) involving DOE/RFO and EG&G was held on September 27, 1993. Subsequent to this meeting, an issue paper was prepared by DOE/RFO for presentation to EPA and CDH. Note that this issue paper is provided as an attachment.

We request that EG&G not initiate RFI/RI field activities at IHSSs within OU 9 and 10 under the IAG which are active units. This applies to those units having interim status, permitted units and units not currently regulated under the Resource Conservation and Recovery Act and Colorado Hazardous Waste Act. If we were to complete RFI/RI field work at an active unit, a possibility exists that a release could occur at some time in the future which would require DOE/RFO to repeat a portion or all of the field activities previously conducted. This would be a misuse of funds.

At the time an active unit under the IAG is no longer required for use, it will be appropriate for DOE/RFO to initiate RFI/RI field activities, and closure where necessary, under the IAG and the RFP RCRA Part B Permit.

As discussed in the attachment, the IAG does not have a placeholder for active units. Thus, this will be among the issues discussed with EPA and CDH during the IAG renegotiation.

We would also like to take this opportunity to request that EG&G review the attachment and provide comments to DOE/RFO that may be helpful in our renegotiation.

CORRES CONTROL x x
PATS/T130G x
ADMN RECORD/080 x

Reviewed for Addressee
Corres. Control RFP

12-8-93 Ci
DATE BY

Ref Ltr. #

Attachment

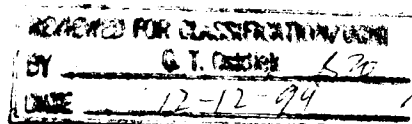
DOE ORDER # 5400.1

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL



000013823

Martin H. McBride
Martin H. McBride
Acting Assistant Manager for
Environmental Restoration



DEC 07 1993

N. Hutchins
ERD:BKT:13649

2

cc w/Attachment:

R. Schassburger, DAMER, RFO
S. Grace, ERD, RFO
F. Lockhart, ERD, RFO
J. Pepe, ERD, RFO
F. Lockhart, ERD, RFO
B. Thatcher, ERD, RFO
T. Lukow, WMD, RFO
W. Busby, EG&G
B. Peterman, EG&G
G. Anderson, EG&G
D. Schubbe, EG&G